

**REMARKS IN RESPONSE TO THE OFFICE ACTION:**

Claims 1, 3, 4, and 6–44 remain pending in the application. Assignee respectfully requests that the Examiner reconsider and withdraw the rejection of claims 1, 3, 4, and 6–44 in view of the following remarks.

**REJECTION UNDER 35 U.S.C. § 102:**

Claims 1, 3, 4, and 6–44 stand rejected under 35 U.S.C. § 102(a) as allegedly being anticipated by WO 03/067016, or under 35 U.S.C. § 102(e) as be allegedly anticipated by U.S. Patent No. 6,651,744 to Crawford (“Crawford”), which is the US equivalent to WO 03/067016. Assignee requests that the Examiner reconsider and withdraw the above rejections in view of the following remarks.

Independent claim 1 is directed to a wellbore tractor and requires a tractor body having a central fluid passageway extending through the length of the tractor body. Crawford discloses a pipeline pig that includes a plurality of flexible cups that each has a diameter equal to the interior diameter of the pipeline into which the pig has been inserted. Pipeline pigs differ from wellbore tractors because a pipeline pig is moved down the pipeline via fluid pressure, which is the reason for the plurality of flexible cups having a diameter equal to the interior diameter of the pipeline. Thus, a pipeline pig may only be used effectively in a closed system and in a pipeline having the same diameter throughout. A wellbore tractor does not have these same limitations as would be recognized by one of ordinary skill in the art. Crawford does not teach, disclose, or suggest the tractor body as required by independent claim 1.

Independent claim 1 further requires means for driving the tractor through the wellbore. The examiner has represented that the coiled tubing 22 comprises means for driving the pig

through the wellbore. Assignee respectfully disagrees with this characterization as coiled tubing is flexible and could not be used to drive the pig through the wellbore. In fact, Crawford teaches that the pig actually pulls the coiled tubing through the wellbore. *See* col. 8, ln. 59–60; col. 9, ln. 1–2. Thus, Crawford does not disclose, teach, or suggest means for driving a tractor, or even a pig, through the wellbore as required by independent claim 1. For at least these reasons, Assignee respectfully requests that the Examiner reconsider and withdraw the § 102(e) rejection of independent claim 1 as anticipated by Crawford.

Claims 3–4 and 6–8 depend from claim 1, and, thus, incorporate each limitation therein. Therefore, claims 3–4 and 6–8 are allowable for at least the same reasons as independent claim 1. Assignee respectfully requests that the Examiner also reconsider and withdraw the § 102(e) rejection of claims 3–4 and 6–8 as anticipated by Crawford.

Crawford does not teach, disclose, or suggest the limitations of independent claim 9. Independent claim 9 requires a tractor body and means for driving the tractor body through the wellbore. As discussed above, Crawford fails to disclose, teach, or suggest a tractor body or means for driving a tractor, or even the pig, through the wellbore are required by independent claim 9.

Claim 9 also requires one or more rearward facing jets extending through the tractor body. The examiner has identified component 40, as shown in the Figures of Crawford, as one or more rearward facing jets. The Assignee respectfully disagrees as Crawford teaches that component 40 is simply the outer flow bore through the pig. While Crawford does disclose forward facing nozzles 48, 49 that are in communication with the flow bores 40, Crawford fails to disclose, teach, or suggest rearward facing jets as required by independent claim 9. *See* col. 7,

ln. 35–48. For at least these reasons, Assignee respectfully requests that the Examiner reconsider and withdraw the § 102(e) rejection of independent claim 9 as anticipated by Crawford.

Crawford does not teach, disclose, or suggest the limitations of independent claim 10. Specifically, Crawford does not teach, disclose, or suggest a tractor assembly that includes a jet pump. The Examiner has represented that Crawford discloses a jet pump identified as 152. Assignee respectfully disagrees with this characterization. Claim 10 requires that the tractor assembly include a jet pump, which is a specific type of pump. Crawford does not disclose, teach, or suggest the use of a jet pump. Further, the jet pump must be part of the tractor assembly. The surface pump disclosed in Crawford is not part of a downhole tractor assembly, but rather is a surface pump used to pump fluid into the head of the pipeline as shown in Figure 12. *See* col. 11, ln. 17–25. For at least these reasons, Assignee respectfully requests that the Examiner reconsider and withdraw the § 102(e) rejection of independent claim 10 as anticipated by Crawford.

Claims 11–16 depend from claim 10, and, thus, incorporate each limitation therein. Therefore, claims 11–16 are allowable for at least the same reason as independent claim 10. Assignee respectfully requests that the Examiner also reconsider and withdraw the § 102(e) rejection of claims 11–16 as anticipated by Crawford.

Crawford does not teach, disclose, or suggest the limitations of independent claim 17. Claim 17 requires a coiled tubing tractor assembly that comprises one or more rearward facing jet nozzles as well as a tractor and one or more forward facing nozzles. As discussed above, Crawford fails to disclose, teach, or suggest the use of a tractor or a rearward facing nozzle. Instead, Crawford teaches the use of a pig and only forward facing nozzles 48, 49. For at least

these reasons, Assignee respectfully requests that the Examiner reconsider and withdraw the § 102(e) rejection of independent claim 17 as anticipated by Crawford.

Claims 18–20 depend from claim 17, and, thus, incorporate each limitation therein. Therefore, claims 18–20 are allowable for at least the same reason as independent claim 17. Assignee respectfully requests that the Examiner also reconsider and withdraw the § 102(e) rejection of claims 18–20 as anticipated by Crawford.

Crawford does not teach, disclose, or suggest the limitations of independent claim 21. Independent claim 21 requires a jet pump connected between a forward jetting assembly and a tractor. As discussed above, Crawford does not disclose, teach, or suggest the use of a tractor, a jet pump, or a jet pump connected between a forward jetting assembly and a tractor. For at least these reasons, Assignee respectfully requests that the Examiner reconsider and withdraw the § 102(e) rejection of independent claim 21 as anticipated by Crawford.

Claims 22–28 depend from claim 21, and, thus, incorporate each limitation therein. Therefore, claims 22–28 are allowable for at least the same reasons as independent claim 21. Assignee respectfully requests that the Examiner also reconsider and withdraw the § 102(e) rejection of claims 22–28 as anticipated by Crawford.

Crawford does not teach, disclose, or suggest the limitations of independent claim 29. As discussed above, Crawford does not disclose, teach, or suggest a forward jetting assembly and a rearward facing nozzle. For at least these reasons, Assignee respectfully requests that the Examiner reconsider and withdraw the § 102(e) rejection of independent claim 29 as anticipated by Crawford.

Claim 30 depends from claim 29, and, thus, incorporates each limitation therein.

Therefore, claim 30 is allowable for at least the same reasons as independent claim 29. Assignee respectfully requests that the Examiner also reconsider and withdraw the § 102(e) rejection of claim 30 as anticipated by Crawford.

Independent claim 31 requires a coiled tubing tractor assembly comprising one or more forward facing jet nozzles, a jet pump and a tractor. As discussed above, Crawford does not teach, disclose, or suggest a tractor. Further, Crawford does not teach, disclose, or suggest a jet pump as part of a tractor assembly. For at least these reasons, Assignee respectfully requests that the Examiner reconsider and withdraw the § 102(e) rejection of independent claim 31 as anticipated by Crawford.

Claims 32–34 depend from claim 31, and, thus, incorporate each limitation therein. Therefore, claims 32–34 are allowable for at least the same reason as independent claim 31. Assignee respectfully requests that the Examiner also reconsider and withdraw the § 102(e) rejection of claims 32–34 as anticipated by Crawford.

Independent claim 35 requires providing a coiled tubing tractor assembly comprising one or more rearward facing jet nozzles. As discussed above, Crawford does not teach, disclose, or suggest rearward facing jet nozzles. Further, Crawford does not teach, disclose, or suggest a coiled tubing tractor assembly. Claim 35 further requires circulating a portion of a power fluid through the tractor and out the one or more forward facing jet nozzles and circulating another portion of the power fluid through the one or more rearward facing jet nozzles. As discussed above, Crawford does not disclose, teach, or suggest any rearward facing jet nozzles.

Additionally, Crawford does not disclose, teach, or suggest circulating a portion of power fluid

through one portion of the tractor assembly and circulating another portion of the power fluid through another part of the tractor assembly as required by claim 35. For at least these reasons, Assignee respectfully requests that the Examiner reconsider and withdraw the § 102(e) rejection of independent claim 35 as anticipated by Crawford.

Claims 36–37 depend from claim 35, and, thus, incorporate each limitation therein. Therefore, claims 36–37 are allowable for at least the same reason as independent claim 35. Assignee respectfully requests that the Examiner also reconsider and withdraw the § 102(e) rejection of claims 36–37 as anticipated by Crawford.

Independent claim 38 requires providing a coiled tubing tractor assembly comprising one or more forward facing jet nozzles, a jet pump, and a tractor. As discussed above, Crawford does not teach, disclose, or suggest a coiled tubing tractor assembly. Further, Crawford does not teach, disclose, or suggest the use of a jet pump, let alone the use of a jet pump as part of a tractor assembly. For at least these reasons, Assignee respectfully requests that the Examiner reconsider and withdraw the § 102(e) rejection of independent claim 38 as anticipated by Crawford.

Claims 39–41 depend from claim 38, and, thus, incorporate each limitation therein. Therefore, claims 39–41 are allowable for at least the same reason as independent claim 38. Assignee respectfully requests that the Examiner also reconsider and withdraw the § 102(e) rejection of claims 39–41 as anticipated by Crawford.

Independent claim 42 requires providing a coiled tubing tractor assembly comprising one or more forward facing jet nozzles and one or more rearward facing jet nozzles. As discussed above, Crawford does not teach, disclose, or suggest a coiled tubing tractor assembly or rearward facing jet nozzles as part of a coiled tubing tractor assembly. Claim 42 further requires

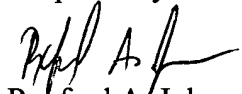
circulating a portion of a power fluid through the tractor and out the one or more forward facing jet nozzles and circulating another portion of the power fluid through the one or more rearward facing jet nozzles. As discussed above, Crawford does not disclose, teach, or suggest any rearward facing jet nozzles. Additionally, Crawford does not disclose, teach, or suggest circulating a portion of power fluid through one portion of the tractor assembly and circulating another portion of the power fluid through another part of the tractor assembly as required by claim 42. For at least these reasons, Assignee respectfully requests that the Examiner reconsider and withdraw the § 102(e) rejection of independent claim 42 as anticipated by Crawford.

Claims 43–44 depend from claim 42, and, thus, incorporate each limitation therein. Therefore, claims 43–44 are allowable for at least the same reason as independent claim 42. Assignee respectfully requests that the Examiner also reconsider and withdraw the § 102(e) rejection of claims 43–44 as anticipated by Crawford.

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Given the above, Assignee requests that the Examiner indicate the allowance of claims 1, 3–4, and 6–44 in the next paper from the Office. The Examiner is invited to contact the undersigned representative to discuss any issues or questions raised by this paper.

Respectfully submitted,



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